



## U.S. Department of Justice

*United States Attorney*

*Western District of Tennessee*

---

*167 North Main Street, Suite 800  
Memphis, Tennessee 38103*

*Telephone (901)544-4231  
Fax (901)544-4230*

May 1, 2024

William Massey  
3074 East St.  
Memphis, TN 38128  
901-384-4004

Stephen Ross Johnson  
Catalina L.C. Goodwin  
Stella Renee Hammond  
606 West Main Street Suite 300  
Knoxville, TN 37902  
865-637-0661

John Keith Perry  
5699 Getwell Rd. Bldg. G5  
Southaven, MS 38672  
662-536-6868

Kevin Whitmore  
363 Lida Lane  
Cordova, TN 38018  
901-461-1039

Michael Stengel  
619 South Cooper St.  
Memphis, TN 38104  
901-527-3535

Stephen R. Leffler  
2670 Union Avenue Ext Suite 819  
Memphis, TN 38112  
901-527-8830

Martin Zummach  
7125 Getwell Rd. Ste. 201  
Southaven, MS 38672  
662-349-6900

Re: *United States vs. Emmitt Martin, et al.*  
Cr. No. 2:23-cr-20191-MSN

Dear Counsel:

We write in response to your discovery requests and to provide you with our fourth production of discovery in this case. Please note that this production includes items that were previously produced but which have been assigned new Bates numbers to correct previous overlap. Please use the new Bates numbers going forward. This production also includes screenshots of text messages taken from materials previously provided in discovery.

1. As to Rule 16(a)(1)(A) and (B), statements by your clients, including text messages, are included with discovery.

2. As to Rule 16(a)(1)(E), documents, including interview reports, and audio recordings are included with discovery.

3. The government is cognizant of its continuing obligation pursuant to *Brady v. Maryland*, 373 U.S. 83 (1963), and its progeny and will disclose such materials in a timely manner, should they exist. Additionally, the government is aware of its continuing obligation to make impeachment evidence available in a timely manner, should it exist.

4. This production has been placed on USAfx. You should have access today. This evidence is BATES stamped US\_00048002 - US\_00050329. Please let us know if you have any issues accessing these materials. We will provide additional information by email.

We will make additional productions of discovery material as needed as trial approaches. Please feel free to contact us at (901) 544-4231 (David) or (202) 616-2430 (Kate) if you have any questions.

Very truly yours,

KEVIN G. RITZ  
United States Attorney

By: s/David Pritchard  
DAVID PRITCHARD  
Assistant United States Attorney  
167 N. Main Street, Ste. 800  
Memphis, TN 38103  
(901) 544-4231

KRISTEN CLARKE  
ASSISTANT ATTORNEY GENERAL

By: s/Kathryn E. Gilbert  
Forrest Christian  
Deputy Chief

Kathryn E. Gilbert  
Special Litigation Counsel  
150 M Street NE  
Washington, DC 20002  
(202) 616-2430

cc: Clerk of the Court (W.D. Tenn.)

**CERTIFICATE OF SERVICE**

I, Kathryn E. Gilbert, hereby certify that the on the date below, I electronically filed the foregoing with the Clerk of Court for the Western District of Tennessee via the Electronic File System which sent notification to counsel of record.

s/ Kathryn E. Gilbert

KATHRYN E. GILBERT

May 1, 2024